

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE EQUIFAX, INC. CUSTOMER
DATA SECURITY BREACH
LITIGATION

Adams v. Equifax Inc.,
1:19-cv-03682-TWT (N.D. Ga.)

MDL DOCKET NO. 2800
1:17-md-2800-TWT

CONSUMER TRACK

NOTICE OF POTENTIAL INTRADISTRICT TAG-ALONG ACTION

Pursuant to Rule 7.2(a) of the United States Judicial Panel on Multidistrict Litigation (“JPML”) and Section 14 of Case Management Order No. 2 (Dkt. No. 87, “CMO-2”) in the above-referenced MDL proceeding, Defendant Equifax Inc. (“Equifax”) hereby notifies the Court of the following potential tag-along action filed by *pro se* Plaintiff Adams in the Northern District of Georgia:

- *Adams v. Equifax Inc.,* 1:19-cv-03682-TWT (N.D. Ga.)

This action arises out of the data security incident Equifax announced on September 7, 2017, and involves similar factual and legal issues as the related cases pending before the Court in the Consumer Track of the MDL proceeding. A copy of the Complaint filed in the related action is attached as Exhibit A.

Accordingly, Equifax respectfully requests that the action be included with the other related cases in the Consumer Track of the MDL. *See CMO-2 at Section*

14 (directing that related action shall be consolidated in the MDL if no party objects to intradistrict transfer within seven (7) days). Equifax further requests that, upon transfer to the MDL proceeding, Plaintiff's action be administratively closed in accordance with Section 3 of CMO-2 and the Orders entered by the MDL Court on February 20, 2019 (Dkt. No. 567) and March 13, 2019 (Dkt. No. 639).

Respectfully submitted this 10th day of October, 2019.

/s/ S. Stewart Haskins II
KING & SPALDING LLP
David L. Balser
Georgia Bar No. 035835
Phyllis B. Sumner
Georgia Bar No. 692165
S. Stewart Haskins II
Georgia Bar No. 336104
Elizabeth D. Adler
Georgia Bar No. 558185
John C. Toro
Georgia Bar No. 175145
1180 Peachtree Street, N.E.
Atlanta, Georgia 30309
Tel.: (404) 572-4600
Fax: (404) 572-5140
dbalser@kslaw.com
psumner@kslaw.com
shaskins@kslaw.com
eadler@kslaw.com
jtoro@kslaw.com

Counsel for Defendant Equifax Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record. I have also caused a copy of the foregoing to be served upon *pro se* Plaintiff Adams via U.S. Mail, postage prepaid, and addressed as follows:

Douglas Emery Adams
519 Colgate Drive
Allen, TX 75013

/s/ S. Stewart Haskins II
S. Stewart Haskins II